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12 *Attorneys for California Governor's Office of  
13 Emergency Services*

14 **UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION**

16 In re:

17 PG&E CORPORATION

18 - and -

19 PACIFIC GAS AND ELECTRIC  
COMPANY,

20 Debtors.

- 21 ☐ Affects PG&E Corporation  
22 ☐ Affects Pacific Gas and  
Electric Company  
23 ☒ Affects both Debtors

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF GRADY JOSEPH IN  
SUPPORT OF CAL OES'S OPPOSITION  
TO OFFICIAL COMMITTEE OF TORT  
CLAIMANTS' OMNIBUS OBJECTION TO  
ITS CLAIMS**

Date: February 26, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

25  
26 I, Grady Joseph, declare as follows:

27 1. I am Assistant Director of Recovery Operations for the California Governor's  
28 Office of Emergency Services ("Cal OES"). If called to do so, I could and would competently

1 testify to the facts set forth below based on my personal knowledge.

2           2.       In connection with the Butte Fire, the North Bay Fires and the Camp Fire  
3 (collectively, the “**Wildfires**”), Cal OES (i) coordinated mutual aid for fire suppression and for  
4 rescue and emergency medical services with in-state and out-of-state agencies, (ii) facilitated the  
5 employment of resources for fire suppression (including several of Cal OES’s fire trucks and  
6 other fire equipment), and (iii) reimbursed agencies for the costs of fire suppression services. In  
7 addition, under the Emergency Management Assistance Compact, Cal OES called upon  
8 firefighters from other states, and even from other countries to help suppress the Wildfires. Cal  
9 OES also requested mutual aid from California agencies to assist in the provision of rescue and  
10 emergency services.

11           3.       Following each of the Wildfires, each of the counties impacted by the Wildfires  
12 issued Resolutions Declaring the Existence of Local Health Emergencies under section 101080 of  
13 the Health and Safety Code. A sampling of the Resolutions Declaring the Existence of Local  
14 Health Emergencies are attached hereto as **Exhibits F-H**.

15           4.       Part of Cal OES’s mission is to collaborate and coordinate the California Mutual  
16 Aid System. In connection with the Wildfires, Cal OES collaborated and coordinated mutual aid,  
17 mission tasked other state departments to confine, prevent, or mitigate the release, escape, or  
18 burning of hazardous substances, and reimbursed other agencies’ costs in to confining,  
19 preventing, or mitigating the release, escape, or burning of hazardous substances


20           5.       To aid in the recovery from the Wildfires, Cal OES offered, and impacted counties  
21 accepted, a government-sponsored residential debris removal program. The Consolidated Debris  
22 Removal Program consisted of two phases: First, the Department of Toxic Substance Control  
23 conducted an initial inspection and removal of household hazardous waste. This hazardous waste  
24 included everything from propane canisters, to household chemicals, to unexploded ordinance.  
25 Then, Cal OES directed a second phase in which the remainder of fire-related hazardous debris  
26 and ash was removed. It appears that many houses that burned in the Wildfires contained toxins,  
27 such as lead and asbestos. These chemicals and toxic amounts of heavy metals such as antimony,  
28 arsenic, cadmium, copper, mercury, thallium, and zinc were in the ash from the Wildfires. The

1 toxic chemicals seeped into foundations of private properties and were present in the soil of  
2 affected areas.

3 6. Cal OES tasked Cal Recycle to remove debris and foundations. Cal Recycle  
4 scraped the soil and performed testing to make sure all hazardous substances were removed.  
5 Following the scraping of the soil, Cal OES took soil samples and, where necessary, directed Cal  
6 Recycle to remove additional soil.

7 7. Attached hereto as **Exhibit I** is a true and correct copy of a tolling agreement  
8 between Cal OES and Pacific Gas & Electric Company.

9  
10 I declare under penalty of perjury that the forgoing is true and correct. Executed on  
11 February 12, 2020 at Mather, California.

12  
13   
14 Grady Joseph